

Approved by:		
	General Manager	Radiation Safety Officer

STANDARD OPERATING PROCEDURE

15.RPP.07

ALARA

1.0 OBJECTIVE

To define specific requirements for conducting As Low As Reasonably Achievable (ALARA) program reviews, briefings, and audits.

2.0 SCOPE

This standard operating procedure (SOP) applies to all operations at the CHDT landfill involving radioactive materials.

3.0 POLICY

All occupational doses received by CHDT workers will be maintained ALARA. The CHDT ALARA program will be reviewed periodically to identify any potential shortcomings or areas of improvement.

4.0 RESPONSIBILITIES

Responsibilities of the CHDT RSO, CHDT management, and other Clean Harbors staff are defined in the Radiation Protection Plan (SOP 15.RPP.01).

5.0 REVIEWS AND BRIEFINGS

ALARA reviews by the CHDT RSO and follow-up briefings with CHDT staff are required when:

- An individual worker's annual dose exceeds or is anticipated to exceed 100 millirem
- Exposure rates exceed 2 milliRoentgens per hour (mR/hr)
- Removable contamination levels exceed 10X the values listed in SOP 15.OPS.13, *Equipment Surveys*, and others.
- Any other potential worker exposure event is anticipated

The ALARA review will be conducted by the CHDT RSO and will identify any specific contamination control procedures, exposure control procedures, or other task-specific requirements. A radiation work permit (RWP) will be created per SOP 15.RPP.08, *Radiation Work Permits*, if required. Following the review, the CHDT RSO will hold a pre-task briefing with affected staff members to present the potential exposure concerns, information in the RWP, and other details regarding the task. A post-task briefing will also be held to present any collected data and to describe any lessons learned. Documentation regarding the review and briefings will be collected in a memorandum to file for later reference.

6.0 ALARA PROGRAM AUDITS

At a minimum, the CHDT RSO will conduct a quarterly review of CHDT worker external and internal exposures to identify any ALARA concerns. An audit of the ALARA program will be performed and documented as part of the CHDT Annual Report required under License Condition 41 of the Colorado Radioactive Materials License. Any ALARA reviews and briefings conducted in the calendar year will be identified and discussed in the Annual Report.

7.0 REFERENCES

None.